

# EXHIBIT P

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20 *Counsel for Plaintiff*  
21 *The Regents of the University of California*

22 UNITED STATES DISTRICT COURT  
23  
24 NORTHERN DISTRICT OF CALIFORNIA

25 THE REGENTS OF THE UNIVERSITY OF  
26 CALIFORNIA, a California corporation,

27 Plaintiff,

28 v.

29 ROGER JINTEH ARRIGO CHEN, an individual;  
30 GENIA TECHNOLOGIES, INC., a Delaware  
31 corporation; and DOES 1-25,

32 Defendants.

Case No. 3:16-cv-07396-EMC

**PLAINTIFF'S RESPONSES AND  
OBJECTIONS TO DEFENDANTS'  
ROGER JINTEH ARRIGO CHEN AND  
GENIA TECHNOLOGIES, INC.'S  
FIRST REQUESTS FOR  
PRODUCTION OF DOCUMENTS  
AND THINGS**

1 attorney-client privilege, attorney work-product doctrine, common-interest privilege, or any  
2 other applicable privilege or immunity.

3 Subject to, and not waiving, its general and specific objections, the University will  
4 produce relevant, non-privileged documents proportional to the needs of this case that are  
5 responsive to this request to the extent that they exist, are in the custody and control of the  
6 University, and are reasonably accessible.

7 **REQUEST NO. 11:**

8 All agreements, including without limitation employment or consulting agreements  
9 containing or referring to any ownership of or obligations regarding intellectual property  
10 between or among the University and any alleged the University Inventor and/or Roger Chen.

11 **RESPONSE NO. 11:**

12 The University incorporates by reference each of its general objections above. The  
13 University objects to this request to the extent it calls for information protected from discovery  
14 by the attorney-client privilege, attorney work-product doctrine, common-interest privilege, or  
15 any other applicable privilege or immunity, or that is otherwise protected from disclosure under  
16 the Federal Rules of Civil Procedure, The Federal Rules of Evidence, or the relevant statutory or  
17 case law. The University objects to this request as not limited to a specific time period or a  
18 reasonable time frame relevant to this case. The University further objects to this request to the  
19 extent it requests “All agreements” rather than documents sufficient to show the requested  
20 information. The University objects to this request because it calls for information that may be  
21 subject to third party confidentiality obligations or restrictions. The University further objects to  
22 this request as overbroad, irrelevant, not reasonably calculated to lead to the discovery of  
23 admissible evidence, not proportional to the needs of this case, and beyond the scope of  
24 permissible discovery at least with regard to the term “agreements” and to the extent it seeks  
25 documents without regard to the relevance to any claims or defenses in this case (for example, to  
26 the extent that it seeks production of documents or things that do not relate to the subject matter  
27 of the Active University Patent Applications, Genia Patents, and/or written materials from the  
28 UCSC Laboratory identified in the Complaint).

1 The University will not search for or produce documents responsive to this request (that  
2 are not produced in response to other requests) that do not relate to the subject matter of the  
3 University Patent Applications, Genia Patents, and/or written materials from the UCSC  
4 Laboratory identified in the Complaint, based at least on its objections that they are not relevant  
5 to any claims or defenses in this case, not reasonably calculated to lead to the discovery of  
6 admissible evidence, and/or not proportional to the needs of this case. The University also will  
7 not produce documents responsive to this request that are protected from discovery by the  
8 attorney-client privilege, attorney work-product doctrine, common-interest privilege, or any  
9 other applicable privilege or immunity.

10 Subject to, and not waiving, its general and specific objections, the University will  
11 produce relevant, non-privileged documents proportional to the needs of this case that are  
12 responsive to this request to the extent that they exist, are in the custody and control of the  
13 University, and are reasonably accessible.

14 **REQUEST NO. 12:**

15 All policies or procedures relating to research and alleged inventions by the alleged the  
16 UCSC Inventors and/or Roger Chen regarding nanopore technology, including without limitation  
the Patent Agreement, the University's Policy, and any assignments or agreements.

17 **RESPONSE NO. 12:**

18 The University incorporates by reference each of its general objections above. The  
19 University objects to this request to the extent it calls for information protected from discovery  
20 by the attorney-client privilege, attorney work-product doctrine, common-interest privilege, or  
21 any other applicable privilege or immunity, or that is otherwise protected from disclosure under  
22 the Federal Rules of Civil Procedure, The Federal Rules of Evidence, or the relevant statutory or  
23 case law. The University objects to this request as not limited to a specific time period or a  
24 reasonable time frame relevant to this case. The University further objects to this request to the  
25 extent it requests "All policies or procedures" rather than documents sufficient to show the  
26 requested information. The University further objects to this request as overbroad, vague and  
27 ambiguous, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence,  
28 overly burdensome, and beyond the scope of permissible discovery to the extent at least with

1 without regard to the relevance to any claims or defenses in this case. The University objects to  
2 this request to the extent that it would impose a duty on the University to undertake a search for,  
3 or an evaluation of, or production of information, documents, or things for which Defendants are  
4 equally able to search for, evaluate, and obtain, including documents that are publicly available,  
5 in the possession of third parties, and/or are already in the possession of Defendants.

6 The University will not produce documents responsive to this request (that are not  
7 produced in response to other requests) that are protected from discovery by the attorney-client  
8 privilege, attorney work-product doctrine, common-interest privilege, or any other applicable  
9 privilege or immunity.

10 Subject to, and not waiving, its general and specific objections, the University will  
11 produce relevant, non-privileged documents proportional to the needs of this case that are  
12 responsive to this request to the extent that they exist, are in the custody and control of the  
13 University, and are reasonably accessible.

14 **REQUEST NO. 25:**

15 All documents referring or relating to the licensing, ownership, assignment, or offer to  
16 assign or license (whether past or present, in whole or in part) the alleged inventions described in  
17 the University Patent Applications or rights under the University Patent Applications or their  
18 foreign counterparts.

18 **RESPONSE NO. 25:**

19 The University incorporates by reference each of its general objections above. The  
20 University objects to this request to the extent it calls for information protected from discovery  
21 by the attorney-client privilege, attorney work-product doctrine, common-interest privilege, or  
22 any other applicable privilege or immunity, or that is otherwise protected from disclosure under  
23 the Federal Rules of Civil Procedure, The Federal Rules of Evidence, or the relevant statutory or  
24 case law. The University objects to this request as not limited to a specific time period or a  
25 reasonable time frame relevant to this case. The University further objects to this request  
26 because it does not describe with particularity each item or category as required by Rule 34(b)  
27 of the Federal Rules of Civil Procedure and would be unduly burdensome for the University.  
28 The University further objects to this request to the extent it requests “All documents” rather

1 than documents sufficient to show the requested information. The University objects to this  
2 request because it calls for information that may be subject to third party confidentiality  
3 obligations or restrictions. The University further objects to this request as overbroad, vague and  
4 ambiguous, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence,  
5 overly burdensome, and beyond the scope of permissible discovery to the extent it seeks  
6 documents without regard to the relevance to any claims or defenses in this case (for example, to  
7 the extent that it seeks production of documents or things that only relate to the Inactive  
8 University Patent Applications, since those applications are not the subject of any claim or  
9 defense in this case). The University objects to this request to the extent that it would impose a  
10 duty on the University to undertake a search for, or an evaluation of, or production of  
11 information, documents, or things for which Defendants are equally able to search for, evaluate,  
12 and obtain, including documents that are publicly available, in the possession of third parties,  
13 and/or are already in the possession of Defendants.

14 The University will not produce documents responsive to this request (that are not  
15 produced in response to other requests) that are protected from discovery by the attorney-client  
16 privilege, attorney work-product doctrine, common-interest privilege, or any other applicable  
17 privilege or immunity.

18 **REQUEST NO. 26:**

19 All documents referring or relating to any valuation of the alleged the University  
20 Inventions and/or University Patent Applications.

21 **RESPONSE NO. 26:**

22 The University incorporates by reference each of its general objections above. The  
23 University objects to this request to the extent it calls for information protected from discovery  
24 by the attorney-client privilege, attorney work-product doctrine, common-interest privilege, or  
25 any other applicable privilege or immunity, or that is otherwise protected from disclosure under  
26 the Federal Rules of Civil Procedure, The Federal Rules of Evidence, or the relevant statutory or  
27 case law. The University further objects to this request because it does not describe with  
28 particularity each item or category as required by Rule 34(b) of the Federal Rules of Civil

1 Procedure and would be unduly burdensome for the University. The University further objects  
2 to this request to the extent it requests “All documents” rather than documents sufficient to show  
3 the requested information. The University further objects to this request as overbroad, vague and  
4 ambiguous, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence,  
5 overly burdensome, and beyond the scope of permissible discovery at least with regard to the  
6 term “valuation” and to the extent it seeks documents without regard to the relevance to any  
7 claims or defenses in this case (for example, to the extent that it seeks production of documents  
8 or things that only relate to the Inactive University Patent Applications, since those applications  
9 are not the subject of any claim or defense in this case).

10 The University will not produce documents responsive to this request (that are not  
11 produced in response to other requests) that are protected from discovery by the attorney-client  
12 privilege, attorney work-product doctrine, common-interest privilege, or any other applicable  
13 privilege or immunity.

14 **REQUEST NO. 27:**

15 All communications between the University and third parties referring or relating to any  
16 royalties sought, paid, or received in connection with the alleged the University Inventions.

17 **RESPONSE NO. 27:**

18 The University incorporates by reference each of its general objections above. The  
19 University objects to this request to the extent it calls for information protected from discovery  
20 by the attorney-client privilege, attorney work-product doctrine, common-interest privilege, or  
21 any other applicable privilege or immunity, or that is otherwise protected from disclosure under  
22 the Federal Rules of Civil Procedure, The Federal Rules of Evidence, or the relevant statutory or  
23 case law. The University further objects to this request to the extent it requests “All  
24 communications” rather than documents sufficient to show the requested information. The  
25 University objects to this request as not limited to a specific time period or a reasonable time  
26 frame relevant to this case. The University further objects to this request because it does not  
27 describe with particularity each item or category as required by Rule 34(b) of the Federal Rules  
28 of Civil Procedure and would be unduly burdensome for the University. The University further

1 objects to this request to the extent it requests “All documents” rather than documents sufficient  
2 to show the requested information. The University objects to this request because it calls for  
3 information that may be subject to third party confidentiality obligations or restrictions. The  
4 University further objects to this request as overbroad, vague and ambiguous, irrelevant, not  
5 reasonably calculated to lead to the discovery of admissible evidence, overly burdensome, and  
6 beyond the scope of permissible discovery to the extent it seeks documents without regard to the  
7 relevance to any claims or defenses in this case (for example, to the extent that it seeks  
8 production of documents or things that only relate to the Inactive University Patent  
9 Applications, since those applications are not the subject of any claim or defense in this case).

10 The University will not produce documents responsive to this request (that are not  
11 produced in response to other requests) that are protected from discovery by the attorney-client  
12 privilege, attorney work-product doctrine, common-interest privilege, or any other applicable  
13 privilege or immunity.

14 **REQUEST NO. 28:**

15 All documents referring or relating to any royalties calculated and/or paid by the  
16 University to Roger Chen or any of the alleged the UCSC Inventors.

17 **RESPONSE NO. 28:**

18 The University incorporates by reference each of its general objections above. The  
19 University objects to this request to the extent it calls for information protected from discovery  
20 by the attorney-client privilege, attorney work-product doctrine, common-interest privilege, or  
21 any other applicable privilege or immunity, or that is otherwise protected from disclosure under  
22 the Federal Rules of Civil Procedure, The Federal Rules of Evidence, or the relevant statutory or  
23 case law. The University objects to this request as not limited to a specific time period or a  
24 reasonable time frame relevant to this case. The University further objects to this request  
25 because it does not describe with particularity each item or category as required by Rule 34(b)  
26 of the Federal Rules of Civil Procedure and would be unduly burdensome for the University.  
27 The University further objects to this request to the extent it requests “All documents” rather  
28 than documents sufficient to show the requested information. The University objects to this



1 request because it calls for information that may be subject to third party confidentiality  
2 obligations or restrictions. The University further objects to this request as overbroad, vague and  
3 ambiguous, irrelevant, not reasonably calculated to lead to the discovery of admissible evidence,  
4 overly burdensome, and beyond the scope of permissible discovery to the extent it seeks  
5 documents without regard to the relevance to any claims or defenses in this case (for example, to  
6 the extent that it seeks production of documents or things that do not relate to the subject matter  
7 of the Active University Patent Applications, Genia Patents, and/or written materials from the  
8 UCSC Laboratory identified in the Complaint).

9 The University will not search for or produce documents responsive to this request (that  
10 are not produced in response to other requests) that do not relate to the subject matter of the  
11 University Patent Applications, Genia Patents, and/or written materials from the UCSC  
12 Laboratory identified in the Complaint, based at least on its objections that they are not relevant  
13 to any claims or defenses in this case, not reasonably calculated to lead to the discovery of  
14 admissible evidence, and/or not proportional to the needs of this case. The University also will  
15 not produce documents responsive to this request that are protected from discovery by the  
16 attorney-client privilege, attorney work-product doctrine, common-interest privilege, or any  
17 other applicable privilege or immunity.

18 **REQUEST NO. 29:**

19 All documents referring or relating to Oxford Nanopore, including without limitation its  
20 relationship with Plaintiff, any agreements between it and Plaintiff, and its involvement in this  
litigation.

21 **RESPONSE NO. 29:**

22 The University incorporates by reference each of its general objections above. The  
23 University objects to this request to the extent it calls for information protected from discovery  
24 by the attorney-client privilege, attorney work-product doctrine, common-interest privilege, or  
25 any other applicable privilege or immunity, or that is otherwise protected from disclosure under  
26 the Federal Rules of Civil Procedure, The Federal Rules of Evidence, or the relevant statutory or  
27 case law. The University objects to this request as not limited to a specific time period or a  
28 reasonable time frame relevant to this case. The University further objects to this request

1 relevance to any claims or defenses in this case (for example, to the extent that it seeks  
2 production of documents or things that do not relate to the subject matter of the Active  
3 University Patent Applications, Genia Patents, and/or written materials from the UCSC  
4 Laboratory identified in the Complaint). The University objects to this request to the extent that  
5 it would impose a duty on the University to undertake a search for, or an evaluation of, or  
6 production of information, documents, or things for which Defendants are equally able to search  
7 for, evaluate, and obtain, including documents that are publicly available, in the possession of  
8 third parties, and/or are already in the possession of Defendants.

9       The University will not search for or produce documents responsive to this request (that  
10 are not produced in response to other requests) that do not relate to the subject matter of the  
11 University Patent Applications, Genia Patents, and/or written materials from the UCSC  
12 Laboratory identified in the Complaint, based at least on its objections that they are publicly  
13 available or in the possession of Defendants, not relevant to any claims or defenses in this case,  
14 not reasonably calculated to lead to the discovery of admissible evidence, and/or not  
15 proportional to the needs of this case. The University also will not produce documents  
16 responsive to this request that are protected from discovery by the attorney-client privilege,  
17 attorney work-product doctrine, common-interest privilege, or any other applicable privilege or  
18 immunity.

19 **REQUEST NO. 43:**

20       All documents, including without limitation communications, between the alleged the  
21 UCSC Inventors and third parties, including without limitation Oxford Nanopore, Life  
22 Technologies, and Affymetrix, regarding nanopore technology.

22 **RESPONSE NO. 43:**

23       The University incorporates by reference each of its general objections above. The  
24 University objects to this request to the extent it calls for information protected from discovery  
25 by the attorney-client privilege, attorney work-product doctrine, common-interest privilege, or  
26 any other applicable privilege or immunity, or that is otherwise protected from disclosure under  
27 the Federal Rules of Civil Procedure, The Federal Rules of Evidence, or the relevant statutory or  
28 case law. The University further objects to this request because it does not describe with

1 particularity each item or category as required by Rule 34(b) of the Federal Rules of Civil  
2 Procedure and would be unduly burdensome for the University. The University further objects  
3 to this request to the extent it requests “All documents” rather than documents sufficient to show  
4 the requested information. The University objects to this request because it calls for information  
5 that may be subject to third party confidentiality obligations or restrictions. The University  
6 further objects to this request as overbroad, irrelevant, not reasonably calculated to lead to the  
7 discovery of admissible evidence, not proportional to the needs of this case, and beyond the  
8 scope of permissible discovery to the extent that such documents are not relevant to any claims  
9 or defenses in this case, including documents regarding third party not relevant to this case (for  
10 example, to the extent that it seeks production of documents or things that do not relate to the  
11 subject matter of the Active University Patent Applications, Genia Patents, and/or written  
12 materials from the UCSC Laboratory identified in the Complaint).

13 The University will not search for or produce documents responsive to this request (that  
14 are not produced in response to other requests) that do not relate to the subject matter of the  
15 University Patent Applications, Genia Patents, and/or written materials from the UCSC  
16 Laboratory identified in the Complaint, based at least on its objections that they are not relevant  
17 to any claims or defenses in this case, not reasonably calculated to lead to the discovery of  
18 admissible evidence, and/or not proportional to the needs of this case. The University also will  
19 not produce documents responsive to this request that are protected from discovery by the  
20 attorney-client privilege, attorney work-product doctrine, common-interest privilege, or any  
21 other applicable privilege or immunity.

22 **REQUEST NO. 44:**

23 All documents relating to any actions taken by the University from January 1, 2007  
24 through December 29, 2014 to protect its alleged rights in the alleged the University Inventions,  
including without limitation all related factual investigations.

25 **RESPONSE NO. 44:**

26 The University incorporates by reference each of its general objections above. The  
27 University objects to this request to the extent it calls for information protected from discovery  
28 by the attorney-client privilege, attorney work-product doctrine, common-interest privilege, or

1 responsive to this request to the extent that they exist, are in the custody and control of the  
2 University, and are reasonably accessible at an appropriate time in the litigation.

3 **REQUEST NO. 53:**

4 All documents produced or provided formally or informally by third parties to the  
5 University relating to any claim or defense in the above-captioned action.

6 **RESPONSE NO. 53:**

7 The University incorporates by reference each of its general objections above. The  
8 University objects to this request to the extent it calls for information protected from discovery  
9 by the attorney-client privilege, attorney work-product doctrine, common-interest privilege, or  
10 any other applicable privilege or immunity, or that is otherwise protected from disclosure under  
11 the Federal Rules of Civil Procedure, The Federal Rules of Evidence, or the relevant statutory or  
12 case law. The University further objects to this request because it does not describe with  
13 particularity each item or category as required by Rule 34(b) of the Federal Rules of Civil  
14 Procedure and would be unduly burdensome for the University. The University further objects  
15 to this request to the extent it requests "All documents" rather than documents sufficient to show  
16 the requested information. The University objects to this request because it calls for information  
17 that may be subject to third party confidentiality obligations or restrictions. The University  
18 further objects to this request as vague and ambiguous, irrelevant, not reasonably calculated to  
19 lead to the discovery of admissible evidence, overly burdensome, and beyond the scope of  
20 permissible discovery to the extent it seeks documents without regard to the relevance to any  
21 claims or defenses in this case.

22 The University will not produce documents responsive to this request (that are not  
23 produced in response to other requests) that are protected from discovery by the attorney-client  
24 privilege, attorney work-product doctrine, common-interest privilege, or any other applicable  
25 privilege or immunity.

26 Subject to, and not waiving, its general and specific objections, the University will  
27 produce relevant, non-privileged documents proportional to the needs of this case that are  
28 responsive to this request to the extent that they exist, are in the custody and control of the

1 University, and are reasonably accessible.

2 **REQUEST NO. 54:**

3 To the extent not produced in response to any of the preceding requests, all documents  
4 identified in or referred to in the preparation of responses to the Interrogatories.

5 **RESPONSE NO. 54:**

6 The University incorporates by reference each of its general objections above. The  
7 University objects to this request to the extent it calls for information protected from discovery  
8 by the attorney-client privilege, attorney work-product doctrine, common-interest privilege, or  
9 any other applicable privilege or immunity, or that is otherwise protected from disclosure under  
10 the Federal Rules of Civil Procedure, The Federal Rules of Evidence, or the relevant statutory or  
11 case law. The University further objects to this request because it does not describe with  
12 particularity each item or category as required by Rule 34(b) of the Federal Rules of Civil  
13 Procedure and would be unduly burdensome for the University. The University further objects  
14 to this request to the extent it requests "All documents" rather than documents sufficient to show  
15 the requested information.

16 The University will not produce documents responsive to this request (that are not  
17 produced in response to other requests) that are protected from discovery by the attorney-client  
18 privilege, attorney work-product doctrine, common-interest privilege, or any other applicable  
19 privilege or immunity.

20 Subject to, and not waiving, its general and specific objections, the University will  
21 produce relevant, non-privileged documents proportional to the needs of this case that are  
22 responsive to this request to the extent that they exist, are in the custody and control of the  
23 University, and are reasonably accessible.

24 **REQUEST NO. 55:**

25 All documents not produced in response to another document request, upon which the  
26 University intends to rely at any trial or hearing or deposition in the above-captioned action.  
27  
28

1 DATED: April 14, 2017

**BAKER BOTTS LLP**

2 **By:** /s/ Stuart C. Plunkett

3 Stuart C. Plunkett (SBN 187971)

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*Counsel for Plaintiff*

*The Regents of the University of California*

**CERTIFICATE OF SERVICE**

I am employed in the County of San Francisco, State of California. I am over the age of 18 years and not a party to this action. My business address is Baker Botts L.L.P., 101 California Street, Suite 3600, San Francisco, CA 94111.

On May 15, 2017, I served the following documents entitled:

**PLAINTIFF'S RESPONSES AND OBJECTIONS TO DEFENDANTS' ROGER JINTEH ARRIGO CHEN AND GENIA TECHNOLOGIES, INC. FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS**

by serving true copies of the above-described documents in the following manner:

  X   BY ELECTRONIC MAIL: The above-described documents were transmitted via electronic mail to the following parties on April 14, 2017:

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The parties on whom this electronic mail has been served has agreed in writing to such form of service pursuant to agreement.

I declare that I am employed in the office of a member of the Bar of, or permitted to practice before, this Court at whose direction the service was made and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 15, 2017, at San Francisco, California.

/s/ Stephanie DM Pearson  
Stephanie DM Pearson